

# **7 AAC 57 Child Care Facilities Licensing Proposed Regulation Changes**

## **Comments and Questions with Responses**

The Child Care Program Office (CCPO) would like to thank all interested parties who commented and submitted questions regarding the proposed changes to 7 AAC 57 Child Care Facilities Licensing.

Before any new Child Care Licensing regulations are adopted, the Child Care Program Office will be going through a process of reviewing all of the questions and comments received during the public comment period. This will take some time and may result in further revisions based on those comments. From there the proposed regulation revisions will go through an adoption process at the Department of Health and Social Services, Department of Law and then the Governor's Office. We do not have a timeline for if or when proposed regulations may be adopted but will implement a notification process if any regulations are adopted.

Below are aggregated comments and questions, received through October 25, 2015, with responses. This means like comments and questions have been combined if they have the same response. Personal information such as names have been redacted. The below comments and questions with responses are in order of how the regulation citation appears in 7 AAC 57 Child Care Facilities Licensing and the names of the commenters are not displayed. Only those proposed regulation citations with comments and questions are listed below.

**NOTE:** The public comment period closed Sunday, October 25, 2015 at 5pm.

### **7 AAC 57.025(b) Compliance and other reviews.**

- 1. Comment/Question:** On pages three and four, under 7 AAC 57.025(b), the option for self-monitoring has been removed and the number of biannual and annual inspections has increased. I am concerned that there is no remote or alternative option to inspections. What happens if the inspectors are not available within 90 days of receiving an application or before the necessary deadlines? Will facilities be asked to close their doors until the inspections can be carried out? Local providers report delays in approving applications because the inspectors, based out of Anchorage,

do not have the time to travel to the Southern Kenai Peninsula in order to complete the inspections, and providers with simple yes or no questions wait days or weeks for a response from the licensers.

Furthermore, the update to 7 AAC 57.025 appears to delete language stating that the department will issue updated licenses within 20 days. As providers require an expected timeline of new licensing in order to remain in compliance, I sincerely hope that this time limit for issuing updated licenses can be found in another section of regulation.

**Response:**

Proposed language will align with the Inspections the State is currently conducting. Self-Monitoring packets have not been required for many years and were eliminated to reduce the burden and amount of paperwork the providers have to submit.

State of Alaska Licensing Specialists visit licensed providers at least twice a year in all areas of Alaska. If the State cannot be on-site out for an Inspection, the regulations allow for the State to extend the license. The State has processes and timeframes in place to receive the required paperwork and conduct Inspections prior to a facility's license being renewed. If an unforeseen circumstance arises which would delay an Inspection, a provider would not have to close as the license would be extended for a period of time to allow for the Inspection to be conducted and give the provider time to respond and correct any non-compliances identified during the Inspection. This is the current process and is not changing.

In regards to deleting language stating the department will issue updated licenses within 20 days, the State has processes and timeframes in place to receive required paperwork, conduct Inspections, and issues a new license prior to a facility's expiration date.

A renewal packet is sent to a provider 120 days prior to expiration of their license. The complete renewal packet is required to be returned to the State by the provider within 30 days (90 days prior to expiration of their license). Once the complete renewal packet is received completed, the Licensing Specialist calls the provider to schedule the Inspection. Inspections typically occur 60 days prior to the expiration of their license. This allows the provider adequate time (usually 15-30 days) to correct any areas of non-compliance found during the Inspection.

Licenses are typically issued at least 30 days prior to expiration of their license, unless as stated above the license has been extended.

### **7 AAC 57.050. Self-monitoring reports.**

**1. Comment/Question:** We agree with 7 AAC 57.050.

**Response:** Thank you for your comment.

### **7 AAC 57.210 Administrator.**

**1. Comment/Question:** Regarding part (c) of 7 AAC 57.210. (Administrator), we wanted some clarification on one clause and to make a recommendation. First, when referring to the opening clause “Unless the governing body or owner of a child care facility has previously designated an onsite child care associate who is qualified under 7 AAC 57.330,” does that only refer to the abovementioned timeframe mentioned clause, (b) “...If the administrator is absent for three consecutive weeks or longer, the child care facility governing body or owner shall designate a child care associate qualified under 7 AAC 57.330 to act on behalf of the administrator,” or can there be a long-term designation?

Specifically, this has an implication to Camp Fire Alaska, as the largest licensed childcare provider in the state (with 29 licensed center sites), and may have similar implications for other “chain” or “corporation” style infrastructures (perhaps with 5 or more sites). In our case, the “Director” is in fact the one listed on each License and is responsible for the oversight of quality program delivery, though is not there to administer the day-to-day operations; Camp Fire designates an associate administrator (also qualified under 7 AAC 57.330) to supervise youth and staff as well as engage daily with families. Based on the size of our non-profit organization, the associate administrator (not listed on the License) does not perform all the tasks often associated with single-site center’s Administrators. For example, Camp Fire has separate departments to handle the registration, billing, and accounting (for all 29 sites). Moreover, we have multiple levels of supervision oversight to ensure each site (and each designated associate administrator) has all the skills and abilities to

implement any and all improvements necessary to run high quality sites with little to no non-compliances.

**Response:** Thank you for your comment. 7 AAC 57.210 Administrator, is not part of this proposed regulation package. Because this question does not pertain to proposed regulation changes it has been forwarded to our Child Care Licensing team who will contact you.

### **7 AAC 57.220. Child care facility operation and management.**

**1. Comment/Question:** We agree with 7 AAC57.220 change so no misunderstanding about who is working with our children.

**Response:** Thank you for your comment.

### **7 AAC 57.220(b). Child care facility operation and management.**

**1. Comment/Question:** I am concerned that the new language under 7 AAC 57.220(b)(2) makes it sound like an administrator would not be able to go on field trips, attend meetings, or leave to purchase supplies which is not feasible. It states that the administrator must be on site during operating hours. Also, having this person working at all times is expensive and creates a hardship for that person's family life. There are many qualified people working in child care centers that may not meet every requirement to be a CCA or Director and would be able to function in that role.

**Response:** 7 AAC 57.220(b)(2) only pertains to a Center or Group Home and does not prohibit field trips or an Administrator from participating in a field trip. If there are any children left at the facility, an Administrator or Child Care Associate would need to be present. The intent of the proposed language in 7 AAC 57.200(b)(2) is to ensure that an administrator or a child care associate be onsite to interact with staff, parents and children when children are present at the facility.

**2. Comment/Question:** Requiring the administrator to be onsite at all times is problematic for small, rural providers where the administrator is the owner/operator as well. What happens in the case of an emergency, perhaps even involving a child under their own care? They will have qualified associates (employees) lined up

to manage care in case of an emergency, but a small sole proprietor child care home will likely not have another administrator on staff as the main administrator normally works full time.

**Response:**

7 AAC 57.220(b)(2) only pertains to a Center or Group Home. The intent of the proposed language in 7 AAC 57.220(b)(2) is ensure that an administrator or child care associate be onsite and available to with staff, parents and children while children are in care at the facility.

The reference to short absences is proposed to be repealed as it has never been used in practice and conflicts with current regulation 7 AAC 57.210(b) which states, "During periods when the administrator is absent from the facility, the governing body or owner of the facility with one or more employees shall designate on onsite adult caregiver who meets the age and qualification requirements of 7 AAC 57.300(a) and (b) and has at least one year of child care experience, to act on the behalf of the administrator in the administrator's absence.

**3. Comment/Question:**

The Child Care Licensing office levies fines on programs that are out of compliance. What would the fine amount be for a child care center administrator to leave the program for a meeting or to purchase emergency supplies?

**Response:**

7 AAC 57.220(b)(2), is proposing to remove allowing "short absences" for administrators because this directly conflicts with 7 AAC 57.210, Administrator, which requires an administrator designee to be named if the administrator cannot be present at the facility. As long as the administrator, named on the license, designates a qualified staff person to serve as the administrator for the facility if the need to leave for any reason, the facility will remain in compliance with no enforcements actions or fines imposed. There is no change to regulation 7 AAC 57.210.

## **7 AAC 57.300. Qualifications of an administrator**

**1. Comment/Question:** 7 AAC 57.300, we are for the changes.

**Response:** Thank you for your comment or question.

**2. Comment/Question:** I would ask you to look beyond Anchorage and the populated areas of the state when you promulgate regulations. If you believe the new regulation would in any way inhibit or curtail the expansion of childcare services in rural Alaska I would respectfully request you to reconsider. I am not a childcare giver nor am I in the childcare business but over the years I have watched as services have disappeared from rural Alaska. The complaint I have heard from service providers is that they are over regulated. In times of service shortages it would be my view that the regulators should do all within their power to promote and support the expansion of services to children and families. Thank you for your attention to this regulation matter and to you service to our children

**Response:** Thank you for your comment. This will be taken into consideration to this and/or future proposed regulations changes.

**3. Comment/Question:** Does not appear to align with SEED or Learn and Grow (alternative pathway regarding experience and education) both of which are excellent quality improvement frameworks. 7 AAC 57.300, Qualifications of an administrator, is proposed to be amended to revise the requirements of an administrator for a child care center, child care group home, or child care home. Proposed language in 7 AAC 57.300(a) states the administrator of a child care center, child care group home, and child care home must be at least 21 years of age. Proposed language in 7 AAC 57.300(b) adds the following administrator qualifications: have the skills necessary to handle finances and plan and evaluate programs. Proposed language in 7 AAC 57.300(c) states the administrator of a child care center or child care group home must have management and supervisory skills.

**Response:** Thank you for your comment. Child Care Licensing promotes quality improvement and is working in collaboration with SEED and Learn and Grow to align the pathways of professional development requirements.

## **7 AAC 57.300(a). Qualifications of an administrator.**

- 1. Comment/Question:** 7 AAC 57.300(a) states the administrator of a child care center, child care group home, and child care home must be at least 21 years of age. The proposal to require the administrator to be of a certain age is discriminatory under Alaska law. Alaska not only protects residents who are older, it prohibits discrimination as it applies to young people. Your regulation may be well intended but not legal, in my view.

Secondly, you may be restricting young people who are working in the childcare arena while attending school to become better at what they do with the intention of expanding childcare services. These young people could be future owners of childcare operations in Alaska.

**Response:** 7 AAC 57.300(a) does not prohibit child care staff from being under 21 years of age. This citation is proposed to align the required age of an administrator of a Home to be the same as a Center and a Group Home, which is currently 21 years of age. Currently, only one of 244 administrators of a Home is under 21 years of age, which equates of less than half a percent. There is a variance process in place for individuals who may not meet regulatory requirements.

The proposed regulation change to require an administrator to be 21 years of age is not discriminatory under Alaska law. There are many restricted occupations in the Alaska Administrative Code requiring a person to be a certain age due to the nature of the position or situation.

## **7 AAC 57.300(b). Qualifications of an administrator.**

- 1. Comment/Question:** 7 AAC 57.300(b) adds the following administrator qualifications: have the skills necessary to handle finances and plan and evaluate programs.

It is not clear who will make these determinations of whether an administrator has such skills nor is it clear by what method or rubric such a determination would be evaluated. Such language, in my opinion is ambiguous and also ill-advised in regulation. We currently, and for some time now, have had a severe shortage of childcare services in Alaska. These shortages are compounded in rural Alaska in part because of the regulations and requirements for inspections, licensing,



and hiring qualified employees. Wages are low and parents and children suffer because of this lack of available childcare.

**Response:**

Currently, this requirement is already in regulation 7 AAC 57.300(c) and applies to Centers. The proposed change will add the administrator of a Group Home and a Home, who also need to have these skills. This will be reviewed by a facility's Child Care Licensing Specialist.

The proposed changes to 7 AAC 57.300(b) and (c) are not expected to inhibit the expansion of childcare services.

### **7 AAC 57.300(c). Qualifications of an administrator.**

- 1. Comment/Question:** Secondly, in this section "must have management and supervisory skills" is equally problematic and apparently is left to someone's opinion.

It is not clear who will make these determinations of whether an administrator has such skills nor is it clear by what method or rubric such a determination would be evaluated. Such language, in my opinion is ambiguous and also ill-advised in regulation. We currently, and for some time now, have had a severe shortage of childcare services in Alaska. These shortages are compounded in rural Alaska in part because of the regulations and requirements for inspections, licensing, and hiring qualified employees. Wages are low and parents and children suffer because of this lack of available childcare.

**Response:**

Currently, this requirement is already in regulation 7 AAC 57.300(c) and applies to Centers. The proposed change will add the administrator of a Group Home, who also have at least one child care staff and need to have these skills. This will be reviewed by a facility's Child Care Licensing Specialist.

### **7 AAC 57.300(e). Qualifications of an administrator.**

- 1. Comment/Question:** Does this mean that the sole proprietor of a home day care is required to have three semester hours of college credit every year? If so, I believe that this is an unreasonable request, due to the time and money required to acquire three semester hours of college credit. Surely, it is not unreasonable that a day care center administrator, with several employees and many children under care should be a well trained professional. But if you put the bar too high, your licensed small day care



proprietors will have no choice but to turn in their licenses and go "under the radar", like all the rest. It seems foolish, as well as unfair, to penalize those who are trying to follow the right path.

**Response:** 7 AAC 57.300(e) is only applicable to administrators of a child care center and does not apply to child care group homes or child care homes. Child care facilities alleged to be illegally operating are investigated when Child Care Licensing is made aware of them and are closed if they are found operating illegally.

**2. Comment/Question:** I think it's very limiting to not consider a business degree as a qualification. If a business degree combined with some ECE credits or CDA could qualify a person to run a child care business, you might find more people interested in doing so.

**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**3. Comment/Question:** Part (e) mentions a bachelor's in ECE or the equivalent. Is there a list of what qualifies as the equivalent?

**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**4. Comment/Question:** Currently, only Early Childhood Education Classes are reimbursed; in order to obtain a bachelor's degree, other classes are required. If the department's goal is to have the administrator receive a bachelor's degree, are they going to expand the classes eligible for reimbursement?

**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**5. Comment/Question:** College credit courses are expensive. There are many resources to earn professional credits and continuing education credits without it being a college class. The extra time and money this would cost to an already overworked Administrator would be overwhelming. The cost would need to be passed on somewhere and most Administrators would

ask for compensation. That cost then would be added to parent tuition which is already at a maximum level. I have passed on this information to my state representative for review. I believe if children are the heart of what we do stirring up more regulations does not make this believable. Administrators have to pay out of pocket for the courses and the reimbursement can take months to process, can this process be streamlined so the turnaround time is faster?

**Response:**

There are ways to defray training costs. One way is by participating in the Child Care Grant Program, which assists licensed providers with operational costs (such as training) associated with their child care facilities, in the form of a monthly reimbursement. For more information and how to apply visit the CCPO website at:

[http://dhss.alaska.gov/dpa/Pages/ccare/ccare\\_grant.aspx](http://dhss.alaska.gov/dpa/Pages/ccare/ccare_grant.aspx).

Licensed providers can also apply for financial assistance for education and training opportunities through thread, Alaska's statewide Child Care Resources and Referral Network:

Professional Development Reimbursement which provides a reimbursement of up to \$1,500 per person, per year for higher education, trainings, or conferences; Travel Reimbursement which provides a reimbursement of up to \$1,000, per person, per year; and "Pathways to Professionalism" which provides up to \$425 for Child Development Associate (CDA) application fees and renewal fees.

The Child Care Program Office will work with thread, Alaska's statewide Child Care Resources and Referral Network, to ensure reimbursement processes are streamlined.

**6. Comment/Question:**

Shall complete any 3 college credits relevant to early care and learning or youth development every year. Courses must be 100, 200, 300, 400, or 600 level courses. Is it the intent to encourage college degrees? If so need to specify which levels because 500 level courses do not articulate into a degree. Or are 500 level courses ok? I also think we need to include youth considering the approximately 35% of available spaces are school age. How can you require the 6 EC within this process?

I still believe, even school age folks need at min 6 credits in EC development. This being said I do think that the remaining courses for Youth should be relevant to the children they are working with. The university will only allow someone to take 9

credits before they have to enroll in a degree program. How long they have to complete the program is another story.

I know there was talk of 3 college credits toward a degree. Is that not the intention here? Is this something coming later, if so please consider the following: if folks start taking college credits but they are 500 level and then if they do decide to complete a degree will not be very happy because none of the 500 level courses translate into a degree.

**Response:**

Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**7. Comment/Question:**

The other area of concern for us is the changes to 7 AAC 57.300. This would require center directors who do not have a bachelor degree in Early Childhood Development or a "related field" to take one 3 hour college class every year in early childhood development. In the past, this requirement was every two years and directors could take 45 hours of training instead of a college course. Allowing center directors to take 45 hours of training instead of a college course enables them to complete their training on a variety of early childhood topics instead of just one college course.

I would like to share my personal experience with being enrolled in graduate school while working fulltime as a child care administrator. Unlike the school district, most child care centers do not close for summer break, so child care administrators would not be able to simply take a summer class. The amount of time a quality administrator puts into his/her job goes beyond the hours the center is open. Even when I am not working on things for the center, I am constantly reflecting on how I can improve the classrooms or strategizing on how to help children who are having a difficult time. Finding the energy to complete my classes after working a full day can be difficult at times, and I am in graduate school by my own personal choice. I imagine it would be even more difficult to be motivated if the reason for taking the class was to satisfy a state requirement. I also do not have children at home, and I feel this would also make attending classes difficult.

Retention in Alaska early childhood education is already extremely low. Is it really necessary to add a requirement that will put more stress on center directors? I think this

requirement will push many people who have been in the early childhood field for a long time out of the field, because they simply do not have the time to complete a three hour course on top of their work and home life.

Thank you for taking the time to read through my comments, and I hope this will lead to reconsideration of the proposed changes mentioned above. I would hate to see the availability in child care continue to decline as a result of these changes.

**Response:**

Thank you for your comment or question regarding center administrators without a bachelor's degree. This will be taken into consideration to this and/or future proposed regulations changes.

In regards continuing education and/or training requirements for an administrator of a center with a bachelor's degree in child development or the equivalent, proposed language does allow for training hours. The requirements are proposed to be: obtain twenty-four hours of training relevant to child care and development or at least one semester hour of college credit relevant to child care and development each year.

**8. Comment/Question:**

In 7 AAC 57.300(e) and 7 AAC 57.350(f), the changes increase the hours of continuing education and double the hours required for child care homes. While continuing education is an admirable idea, providers in smaller communities already struggle with finding applicable classes. Without support to provide a wider and more affordable selection of classes, providers will struggle with this requirement and their pool of qualified employees will continue to shrink. Additionally, the monetary burden of continuing education continues to grow in a field where most associates make \$8.75 an hour. It may be time for the state to consider raising child care rates or subsidizing continuing education requirements if we want to keep child care options in our communities.

**Response:**

Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**9. Comment/Question:** Does not appear to align with SEED or Learn and Grow (alternative pathway regarding experience and education) both of which are excellent quality improvement frameworks. Proposed language in 7 AAC 57.300(e) states an administrator, unless they have other qualifying education stated in this section, shall participate in continuing education as stated in this section by obtaining three semester hours of college credit in courses relevant to child care and development every year. This currently states every two years.

**Response:** Thank you for your comment. Child Care Licensing promotes quality improvement and is working in collaboration with SEED and Learn and Grow to align the pathways of professional development requirements.

**10. Comment/Question:** Proposed language in 7 AAC 57.300(e) states an administrator, unless they have other qualifying education stated in this section, shall participate in continuing education as stated in this section by obtaining three semester hours of college credit in courses relevant to child care and development every year. This currently states every two years.

Our lead teacher has college credits that are approved for her to be an Administrator Designee, but nothing specifically relevant to child care development. This will be extremely difficult for her to attain the required college credit this first year as a new lead teacher. Please keep us informed if this gets approved.

**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**11. Comment/Question:** Proposed language in 7 AAC 57.300(e) states an administrator, unless they have other qualifying education stated in this section, shall participate in continuing education as stated in this section by obtaining three semester hours of college credit in courses relevant to child care and development every year. This currently states every two years.

Our lead teacher has college credits that are approved for her to be an Administrator Designee, but nothing specifically relevant to child care development. This will be extremely difficult for her to attain the required college credit this first

year as a new lead teacher. Please keep us informed if this gets approved.

**Response:**

Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

- 12. Comment/Question:** We recommend maintaining the current language to allow for a Child Care Administrator to complete three credits in early childhood every two years. While we promote professional development for early childhood education, we think additional financial supports are needed to accomplish this increase without further stressing the child care system in our state. A Quality Recognition Improvement System would offer financial incentives and supports to inspire change, and link to Alaska SEED System for Early Education Development. Changing the language to an AA in early childhood would be a more reasonable goal, as jumping from the current CDA or 12 credits to a BA in early childhood is a large change. Also, if a child care administrator already had an AA in early childhood, they would be likely to have already taken most of the early childhood courses required for a BA.

Thank you for the opportunity to provide comments for these proposed changes. We look forward continuing to grow the quality of early learning in Alaska through support of professional development and advocacy for increased wages and support for program quality improvements.

**Response:**

Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

- 13. Comment/Question:** Proposed language in 7 AAC 57.300 (e) Qualifications of an Administrator: The proposed language that states unless they have other qualifying education, shall participate in continuing education by obtaining three semester hours of college credit in courses relevant to child care and development every year is of concern to me.

I agree that administrators should participate in continuing education every year, however, I disagree that it should be limited to only college credit courses. I have a Master's degree in Counseling & Human Relations, which I hope would be considered a closely related field, but if not, this new regulation

would require that I go back to college every year with a Master's degree.

While I enjoy learning and growing, at this point in my life I would like to be able to develop professionally in ways other than going back to college. I am the director and administrator for one of the largest child care centers in the state. This is a very large and demanding job that must comply with federal, state and local regulations. As you can imagine, I spend long and unpredictable hours managing the center. Not only would taking a three credit class every year cut into my personal family life, but it would impact my ability to give quality time to the center.

If I were allowed to take 45 hours of training per year instead, I could easily fit this into my schedule as I see fit and not further disrupt my time at work or at home. In addition, training instead of a college course would enable me to enjoy a variety of early childhood topics throughout the year instead of just one college course. I anticipate another issue if this regulation were to be in place.

It took the center in which I work over a year to find and hire me due to the qualification and federal regulations of Head Start. Finding and retaining qualified administrators in early childhood education, especially Head Start, where the qualifications are high and pay is not in pace with other administrator positions in other fields will become increasingly difficult to hire. Adding the three college courses as a requirement every year without other options will not only limit the pool of applicants for these positions but will also jeopardize the retention of the ones currently in place.

The job of administrator is already stressful enough that if the three college credit a year requirement was to go into effect, I would need to reconsider my options to see if staying in my current position is worth the extra time, stress and effort knowing there is no way for the center to increase my salary for this extra time, effort and education. I really enjoy what I do and I enjoy being a lifelong learner.

As stated before, I agree that administrators should participate in continuing education yearly, however, there should be other options besides taking a three credit college course. Thank you for allowing me to comment on this issue.



**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**14. Comment/Question:** The response given to me about my concerns stated administrators with a bachelor's degree in child development or the equivalent may use training hours to meet the education requirement. While this is true, my response was intended to address what I personally believe is an unfair requirement on those who have a bachelor's degree that is NOT in child development, "or the equivalent." Because there is not anything in the regulations that discusses what constitutes the equivalent of a bachelor's degree in child development, I have to assume administrators without a bachelor's in early childhood education or child development will be required to take one 3 hour college class a year until they receive a second bachelor degree.

In my opinion, it seems excessive to require someone who already has a bachelor's degree to take one 3 hour course every year until obtaining a second degree while working a very consuming full-time job. I feel this requirement will dissuade those who have a bachelor degree in other fields of study from entering the early childhood field. There is already a limited "pool" of candidates with bachelor's degrees who are willing and able to work for the small amount of money most center directors make. I also do not think it is necessary to have one or two specific bachelor's degrees available to center directors. For example, I feel as though someone with a bachelor's degree in environmental studies and 12 hours of early childhood classes could not only operate effectively as an administrator, but he/she would also bring an interesting perspective to an early childhood center. I understand and agree that it is important to have an administrator who is educated in early childhood development and theory, professional and able to communicate effectively and clearly. I feel it would be better practice to consider those with a bachelor degree in any area of study AND 12 hours in early childhood development or education as meeting the education requirement for the "equivalent" of a child development bachelor's degree. This also aligns with the SEED registry level 9.

I also feel it is unfair to completely take away the option of using training hours to complete the requirement of having a bachelor's degree. Financial and time constraints can make

obtaining a bachelor's degree difficult if not impossible for some people. This does not mean they are not suited to be early childhood administrators and may prevent some passionate people from becoming administrators.

**Response:**

Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

- 15. Comment/Question:** I fully support the intent of increasing the quality of child care through increased professional development of teaching staff. My concern is that the financial impact statement attached to the regulation changes is not accurate, and there is no indication of an adequate increase of financial support to programs to support their ability to meet the significant increase in requirements. If a child care administrator asks one of their teaching staff to obtain training to qualify as a child care associate, they are required by the Department of Labor to pay their wages for time completing training.

Estimated Total cost per year for each 30 children in the program is \$4,700: \$900 thread training fees at \$7.50 per hour x 120 hours; \$1,800 for overtime wages (\$15 hour) to complete evening and weekend 120 hours of training and \$2,000 for annual \$1 per hour raise. Realistically, in order to cover short absences, in addition to ongoing staff turnover, sick days, vacations and ten hour program days, an additional CCA is needed, which would double the cost. The increase of three credit hours per year in professional development for child care administrators also has an unsupported financial impact, and is not accurately reflected in the financial impact statement.

Department of Labor laws also apply to child care administrators. Training required for employment is required to be paid. Since most administrators would be unable to leave the program during weekday hours, the hours would be at an overtime rate. At 45 classroom hours for a 3 credit class, not including homework, and an average administrator wage of \$18 per hour, the cost to the program per administrator would be an estimated \$1,237.50 for every 30 children in care.

The cost to recruit and retain a teaching staff meeting the requirements for a child care associate or administrator are between \$2,000 and \$5,400 annually, based on ROOTS and HEARTS awards. Funding for these awards are not secure in

the future and are not currently available to all teaching staff in the state.

I request that the proposed regulation changes to double the number of child care administrators and associates, and double the annual training for administrators without a bachelor's degree be withdrawn until an accurate financial statement is submitted, along with a financial plan for assisting programs in meeting the requirements. The child care system in Alaska is more fragile than ever before. Child care assistance rates have not increased in over five years. The number of licensed child care spaces is in decline. Closing licensed programs will increase the number of children in unregulated care. Therefore I urge the Department to increase financial support at the same time regulations increase such as through The Alaska Learn and Grow Quality Recognition Improvement System. Thank you for your consideration.

**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**7 AAC 57.310(c). Qualifications and responsibilities of employees and other individuals in a child care facility.**

**1. Comment/Question:** 7 AAC 57.310. We need caregivers to be able to communicate with families and children.

**Response:** Thank you for your comment or question.

**2. Comment/Question:** We recommend using the word effective instead of verbal. Using effective would be non-discriminatory language to support Providers who are hearing impaired, mute, or need other accommodations such as an English as a second language speaker.

**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

## **7 AAC 57.320. Caregiver age requirements and additional qualifications for adolescent caregivers.**

**1. Comment/Question:** 7 AAC.320 Need more information about age.

**Response:** This section is proposed to, in a Center, remove 14 and 15 year old adolescent caregivers from being counted towards the child-to-caregiver ratios. Sixteen and 17 year old caregivers will still be allowed, if they meet the requirements already stated in this section.

## **7 AAC 57.330(a) and (c). Additional employee qualifications for child care centers.**

**1. Comment/Question:** Am I to understand that this would mean both an administrator and a CCA are required to be on site for every 30 children? I would like a yes or no answer to whether the language in 7AAC 57.330(a) now requires a center to have both an administrator AND a CCA for every 30 children. Currently only one admin or one CCA is needed for every 30. If this change means we need both for every 30 children then I would like to comment that I would not be able to meet this requirement with current staffing and will most likely close my center. Currently the regulation states one full-time onsite child care associate and the proposed change suggests TWO qualified persons. I understand the desire to ensure that the quality of care here in our State is exceptional. I can identify that employees who have accreditation such as a CDA tend to be more understanding regarding child development, developmentally appropriate practices, curriculum planning, and qualified individuals seem to make an enriching experience for the children. As the owner and director of a childcare facility in the State of Alaska I want my facility to stand out above the rest in regards to quality. I also want to be a resource and support system for working families in this community. I have tried to plan my hours of operation to help assist parents with their childcare needs. I am open from 6:30am to 7:30pm Monday through Friday. I gain most of my business because of my convenient hours since most of the facilities in my area are open shorter hours.

**Response:** No, a center would not be required to have both an administrator and a child care associate for every 30 children present in the facility.

Proposed language in 7 AAC 57.330(c) allows for a qualified administrator of a child care center to serve in the role of a child care associate for the first 30 children who are present at the child care center. If the facility is under 30 children, an additional child care associate would not be required. This requirements is not a deviation from current regulation; this was split into two sections 7 AAC 57.330(a) and (c) for clarity.

### **7 AAC 57.330(c). Additional employee qualifications for child care centers.**

- 1. Comment/Question:** This proposed regulation reads as confusing as it would be unlikely for an Administrator to substitute for an Associate. Instead, we would like to see the Associate able to substitute for the Administrator. If not, it is written as if the Administrator could never leave the program.

**Response:** Proposed language in 7 AAC 57.330(c) allows for a qualified administrator of a child care center to serve in the role of a child care associate for the first 30 children who are present at the child care center. If the facility is under 30 children, an additional child care associate would not be required. This requirements is not a deviation from current regulation; this was split into two sections 7 AAC 57.330(a) and (c) for clarity.

If an administrator of a center needs to leave the facility they may appoint an administrator designee who meets the requirements of 7 AAC 57.210, Administrator. There is no change to 7 AAC 57.210. The Administrator Designee may or may not be the same person as the child care associate.

It is not the intent for there to be both an administrator and a child care associate for every 30 children present in the facility.

- 2. Comment/Question:** In 7 AAC 57.330 the proposed changes state, “Additional employee qualifications for child care centers, is proposed to be amended to clarify who qualifies as a child care associate and employees that must be on-site. Proposed language states a child care center must have one qualified administrator and at least on child care associate for every 30 children who are present at the facility. Also, the qualified administrator of a child care center may serve as the child care associate, in the child care associate’s absence, for the first 30 children who are present at the facility.”

- Will this change require to have both an administrator AND a child care associate for every 30 children present?
- If yes, would a program offering care to 31 children be required to have 4 total administrators/associates on site at all times? With staggered schedules, vacations, and sick days, this would in reality require recruiting and retaining 6 administrators/associates.
- It states the administrator (director) can substitute for the associate for the first 30 children. Does this mean the associate may NOT substitute for the director, and the director would need to be on site for the full 9-10 hour day? If no, is the wording meant to say the associate can substitute for the administrator?
- Are there plans in place to increase financial support to programs to provide for higher/additional salaries for the increase number of child care associates required in the proposed regulations? This is not apparent in the fiscal impact attached to the regulation change.

**Response:**

Proposed language in 7 AAC 57.330(c) allows for a qualified administrator of a child care center to serve in the role of a child care associate for the first 30 children who are present at the child care center.

This means, if the center is under 30 children, an additional child care associate would not be required. Facilities are still only required to have one administrator, or an administrator designee, present at the facility at any time. Additionally, centers are still required to have one child care associate for every 30 children. There is no change to these requirements.

It is not the intent for there to be an administrator and a child care associate for every 30 children present in the facility.

If an administrator of a center needs to leave the facility they may appoint an administrator designee who meets the requirements of 7 AAC 57.210, Administrator. There is no change to 7 AAC 57.210. The administrator may choose to designate a child care associate or a different staff person as long as that person meets the requirements of 7 AAC 57.210.

Changes to 7 AC 57.330(a) and (c) are not expected to have any financial impact to facilities but there are already several

financial assistance opportunities for licensed child care providers for education and training opportunities:

The Child Care Grant Program, which assists licensed providers with operational costs (such as training) associated with their child care facilities, in the form of a monthly reimbursement. For more information and how to apply visit the CCPO website at:

[http://dhss.alaska.gov/dpa/Pages/ccare/ccare\\_grant.aspx](http://dhss.alaska.gov/dpa/Pages/ccare/ccare_grant.aspx).

Licensed providers can also apply through thread, Alaska's statewide Child Care Resources and Referral Network: Professional Development Reimbursement which provides a reimbursement of up to \$1,500 per person, per year for higher education, trainings, or conferences; Travel Reimbursement which provides a reimbursement of up to \$1,000, per person, per year; and "Pathways to Professionalism" which provides up to \$425 for Child Development Associate (CDA) application fees and renewal fees.

- 3. Comment/Question:** We recommend changing "and at least one on-site..." to "or at least one on-site." We recommend eliminating or clarifying the language regarding substitutions. The proposed language appears to state the child care director may substitute for their associate director, but leaves a question regarding the more common situation of the associate substituting for the director.

The fiscal document attached to this proposed regulation change does not reflect the cost for higher salaries required to recruit and retain staff with higher qualifications. Most programs in Southeast Alaska would be out of compliance if two Child Care Administrators/Associates were required to be on site for every 30 children in attendance, and many would likely face closure if an increase in the number of Child Care Associates was passed as an unfunded mandate.

In Southeast Alaska, the majority of programs currently struggle to meet the minimum number of qualified child care associates, even with the education incentives funded by the City and Borough of Juneau (HEARTS Initiative). The wording of the proposed regulation appears to double the number of total administrators and associates required, from 1 per 30 children, to 2 per 30 children. The prior regulations allowed administrators or associates to leave the program for "short periods of time." Since this length of time was not defined, the proposed regulation changes eliminates this wording.



Another unintended consequence of this proposed change would be to pressure child care centers into offering care in increments of 30 children. For example, if a program offered care for just over 30 children they would be need to have approximately 6 total administrators/ associates in order to cover staggered schedules, vacation and sick days, and a typical ten hour program day.

**Response:**

Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**4. Comment/Question:**

The use of the word “and” in 7AAC 57.330(a) contradicts the use of the word “or” in the proposed language of 7AAC 57.330(a). It is clear that both an administrator AND CCA must be on-site for each 30 children present, not allowing for the administrator or a CCA to be absent at any point of the day. This would include lunch breaks, shopping trips, vacations and illnesses absences. I have read through the comments and the response from the early comment period. I don’t believe the responses correctly address the issues regarding the proposed language in 7AAC 57.330(a).

Some of the responses indicate that the qualified administrator can serve in the role of CCA which I don’t feel is correct according to the language. When the word “and” is used it indicates that the administrator and the CCA cannot be the same person; conflicting with the use of “or” in 7 AAC 57.220(b)(2).

The language needs to agree in both regulations. The center that I am the administrator of currently has three CCAs and two administrators. According to the proposals, for our Center serving up to 60 children during the day , we would need two administrators AND two CCAs on site for more than nine hours. Again, this means that neither of the administrators would be able to be out on leave or ill, or even take a break during the day. It would also prohibit the director and assist. director from attending any training or director meetings during the day. If one of them was away from the Center, one of our CCAs (the only other staff qualified to be administrators) would need to be designated to act as an administrator leaving only two CCAs. In that case neither of the remaining CCAs would be able to be absent from the Center. If even one of our CCAs was out

on leave the other two CCAs would not be able to be out ill or take a break while working longer hours.

Based on almost 20 years of working with licensing specialist I am confident that the use of the word “and” will be enforced. Child care centers will face non-compliance citations and fines. Finding qualified caregivers for CCA positions is a struggle for all facilities. If the language is changed to state that an administrator AND a CCA need to be on-site for every 30 children in care, those administrators and CCA are facing burn out from long hours. This will raise the staff turnover rates for both directors and CCAs. There is talk among providers that centers would close, creating an even greater shortage of child care for communities. Maintaining the additional costs that would be placed upon facilities to pay staff covering longer shifts is a hardship that is unnecessary. I believe it to be unreasonable to expect child care centers to have an administrator AND a CCA on-site for every 30 children.

**Response:**

Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.

**5. Comment/Question:**

There are a lot of center directors and early childhood advocates who are extremely alarmed with this requirement, and I could not find anything in the responses that directly addressed these concerns. Many centers have over 30 children. This requirement reads, "a child care center must have one on-site qualified administrator, under 7 AAC 57.300, AND at least one on-site associate for EACH 30 children who are present at the child care center." I do not see how this can be interpreted to mean anything other than a center with 60 children enrolled must have two administrators AND two CCAs on-site any time there are more than 30 children. The center where I am an administrator has two administrators and three CCAs who are not administrators. This means the director and I will not be able to take any lunch breaks, use sick leave or go on a vacation. In my previous emails, I have gone into extensive detail on how this regulation will negatively impact child care in Alaska.

The comments/questions expressed many of the same concerns I discussed above, but it was answered in regards to 7 AAC 300(c), even though it explicitly referred to 7 AAC 57.330. The concern is not about who meets the qualifications

of an administrator or CCA. The concern is requiring a CCA AND an administrator for every 30 children. We currently have 2 administrators who also qualify as CCAs and 3 CCAs. Right now, the director and I can both be gone from the center to attend conferences, director trainings etc., as long as we have designated an on-site administrator in our absence (the designated administrator also serves as a CCA for the requirement of one CCA per 30 children). In order to be compliant with this new regulation, we would not be able to operate if 2 of our 5 CCAs were gone. This means if one CCA was on vacation, none of our other CCAs (including the director and me) would be able to leave during a large portion of the day.

I understand that this may not have been the intention of the regulation. If this is the case, I feel the department should look into rewording this requirement so it reads in a way that is clear. If this was the intention of the regulation, I feel the department should evaluate the possible ramifications of this requirement. It would make it very difficult for our center to operate and would lead to a great deal of logistical and personal hardships for Gold Creek's staff, especially administrators and CCAs.

Thank you for taking the time to read all of my comments and concerns. I believe Child Care Licensing, early childhood educators and early childhood advocates all have the same goal of increasing the availability and quality of early care in Alaska. I also believe in order to achieve this goal, we must work together to create regulations that are fair, consistent and supportive of the early childhood field. This will require us to have frank discussions on the ramifications of regulation changes, and I appreciate having the opportunity to express my concerns. I hope you have a great weekend, and I appreciate all the work you are doing to make sure our voices are heard.

**Response:**

Proposed language in 7 AAC 57.330(c) allows for a qualified administrator of a child care center to serve in the role of a child care associate for the first 30 children who are present at the child care center.

This means, if the center is under 30 children, an additional child care associate would not be required. Facilities are still only required to have one administrator, or an administrator designee, present at the facility at any time. Additionally, centers are still required to have one child care associate for every 30 children. There is no change to these requirements.

It is not the intent for there to be an administrator and a child care associate for every 30 children present in the facility.

## **7 AAC 57.350(f). Orientation and training.**

### **Comments for 7 AAC 57.350(f). Orientation and training.**

- 1. Comment/Question:** I've been a licensed childcare provider with the State of Alaska since April of 1985. I am licensed for 8 as well as the only income provider of my home. My issue is with adding the 3 credit college classes for all providers from the small home daycare and up. Let me give you a little run down on my day. I wake every morning between 4:30 and 5:00 am. From 6 am to 7 am I am preparing breakfast for the kiddies that begin to arrive around 7 am as well as prepare for the day. 9am breakfast ends and after a quick clean up we have our 1 hour of play time be it inside or the required outdoor time. 10am is Art time as well as preschool time. Sometime around 11:30 I try to get lunch started as I am required by my Food Program schedule to serve my kiddies by noon. 12:30 is clean up, brush teeth read books and prepare for nap. 1:00 pm is nap time (if all goes well) While they sleep (maybe) I clean up the dining room and kitchen, do paper work for the food program and prepare for round 2. If all goes well after all that work is done I might have about 15 minutes to breath. When nap is over by 3:00, I prepare a snack that is required by the food program, snack ends around 4. Then it's on to the kiddies choice, play time, reading, art time until all leave by 5:15. (which doesn't always happen, I'm lucky to be off work by 5:30-6:00.) Might I add, in between all these scheduled hours.

I have to somehow get 20 hours of training per year to maintain my license, 4 hours of additional training for the food program and the 8 to 16 hour classes for first aid and CPR. Everyone of my daycare parents only work 8 hour shifts, I on the other hand work 12 hour shifts, 5 days a week, 52 weeks a year. And if you break it down dollar wise, very little pay. By 6:30 pm I am exhausted, spent, tired. I'm physically drained and mentally drained. But I gladly wake up and do it over and over and over again. The reason for the above break down in my day is, where during this 12 hour shift do you see where I have time for a college course???? Is the 20 hours required by the state and the 4 hours required by the food program not enough?! I invite any one of you to go to a nearby daycare home and work it for a couple days and see what it entails.

Every one of my daycare parents, at one time or another have said to me "I don't know how you do it our jobs are no brainer's compared to yours" said a dad, to me, one day. Seriously?

I have complied with everything the State of Alaska has thrown my way. I NEVER complained. I have an outstanding record and history with the licensing agents as well as the office. I keep my kids at 8, I don't go over, like some of the providers here in Ketchikan. So keeping my kids at 8 keeps my income at a minimum. I can't go any higher unless I change to a group home, but that would require me to drop 3 of my children who are under 21/2.,that I have had since infancy. When you become a childcare provider these children become family, at least that's how I see. If you see it any other way you probably don't have a heart and definitely in the wrong career...

So with being the only income in my home I am on a strict budget. I called the University here in Ketchikan , its \$513.00 for a 3 credit class, not including books. I cannot afford this on a limited budget. I pay \$1,800.00 a month in just insurance. That does not include the never ending medical bills. Then you have your regular bills, rent, utilities etc. By the end of the month it's all I can do not to cry. I am not trying to get sympathy while I ramble, I'm just asking you to be realistic, PLEASE!

I have spoken with most of the providers here in town, the ones that are group homes or centers all have paid help. So they can slip away for an hour or 2 to do college work. I as a child care home I can not do that. One provider told me if this becomes a requirement she will be forced to be an unlicensed provider after 25 years as a licensed provider. There are more unlicensed providers in Ketchikan than there are licensed, and most are very successful, professional and loved. Please, I ask you to let up a little on the small home daycares. And please, go to your nearest daycare home and get the feel of what we do for a living, see what we do 5 days a week 12 hours a day (not 8) 52 weeks a year.

**Response:**

7 AAC 57.350(f) is proposing to increase annual training relevant to child care and development from 20 to 24 hours each year. The training requirements may also be obtained by completing at least one semester hour of college credit. For a Home and Group Home there is no proposed requirement for an administrator to obtain three ECE credits annually.

Licensed providers can also apply for financial assistance for education and training opportunities through thread, Alaska's statewide Child Care Resources and Referral Network: Professional Development Reimbursement which provides a reimbursement of up to \$1,500 per person, per year for higher education, trainings, or conferences; Travel Reimbursement which provides a reimbursement of up to \$1,000, per person, per year; and "Pathways to Professionalism" which provides up to \$425 for Child Development Associate (CDA) application fees and renewal fees.

**2. Comment/Question:** I am in the process of becoming a licensed provider once again. I was licensed for over 10 years before and have been through this process many times and I have seen the changes done to the regulations through the years. I am fortunate enough that another licensed provider told me about the new proposal of having us taking college courses for credits. When I was doing care at the height of my daycare career I was working 12 (or more) hours a day, seven days a week. I made sure that the kids in my care were safe, ate wholesome meals and were educated all while playing. Through these days I would steal time away from them to get my training hours done required by you (the licensing agency) along with the food program wanted plus 6 hours of first aid and CPR. During the times for required training I had to take time off thus letting the parents know that either they find other care for those times or take the time off. This was an inconvenience to them but I tried my best to accommodate them. Now you are asking us to take more time off from our kids to become further educated for what?

1. Time away from these kids doing homework or attending classes is not fair to them. In years past the children I have had in my care come from single parent homes or low income homes where taking off work was a hindrance. I am a home daycare with no help and in my opinion my attention should be on them not homework.

2. Being I am a home daycare I am very dependent on my monthly income. I have bills just like anyone else with a job and if I miss income that means a bill doesn't get paid. I can't afford to pull any more extras out of my income right now and I don't see that changing any time soon.

3. I attended the University Of Alaska in the early 1990's and the cost per credit hour was around \$300.00 then. I don't

know what it is now but I do know the regents are talking about raising the cost of it again. According to the new academic year this is what a credit hour costs. 2015-2016 Tuition Resident: 100-200-level courses \$183/credit; 300-400-level courses \$221/credit; 500-level courses varies; 600-level courses \$423/credit. So the cost to us can be anywhere from (I averaged this) a \$1000.00 and up not including the cost of books or other supplies the class requires. How do you expect us to pull this amount of money out of a daycare budget that is already tight?

4. Ketchikan daycare are still the lowest paid in the state with licensed home daycare being the lowest on the pay rates. There have been no increases in many years and from the people I talked to they will not happen anytime soon. I don't know what the powers that be are thinking of making our lives harder because of a financial burden.

5. I have attended college online and most think it will be a piece of cake and take very little time. Anyone who thinks that is wrong. I was taking 2 or more classes online during a semester. Every class had required discussion boards that were required to be on to full fill the class requirement. Some classes had mandatory class times where one had to be available for. Many of my classes had huge projects (my one final was a 20 page research paper). For 2 classes a semester I was spending 2 hours or more in class time, several hours a day on the discussion boards and many hours getting papers done etc. With all this time being spent on these classes plus all the required training we are already required when are we supposed to spend time with the kids in our care? Why should we make the kids suffer?

6. We as licensed daycare want to provide the best care possible for the children in our care. I am always educating myself on new learning techniques etc. I have many friends that are teachers all over the states that I talk to through Facebook to get new ideas or bounce ideas on them. I do this all on my down time away from the kids as not to take away from them.

We as licensed providers go through a lot of hard work to get our license while watching unlicensed daycares get away with everything. A non-licensed daycare doesn't have to open their door to anyone let alone a licensing agent. Why are you punishing the licensed daycares that are following the regulations the state sets and what our communities set? I am



all for education but it should be up to each person to decide if they want to further their education or not. What you are proposing to do is take time away from our kids, money out of our budgets that are already stretched and add more stress to our lives. I do not think this has been thought through let alone how it impacts daycares across the state. You are making it very difficult for the licensed daycares to continue their licenses. Why should I stay licensed when I can go unlicensed and take as many kids as I want with no one regulating me? We as daycare providers spend (in my case) 80-90% of a child's day with them. That is more time spent with them than their own parents. Why are you asking us to take time away from them learning their way in their life and this world? I hope that the powers that be realize just how detrimental this will be to licensed daycares and the children they watch. Thank you for your time.

**Response:** Thank you for your comment. This will be taken into consideration to this and/or future proposed regulations changes.

## **7 AAC 57.350(i). Orientation and training.**

**1. Comment/Question:** In general, under 7 AAC 57.350 (i) (Orientation and Training), it is our belief that a part-time worker, which is currently the whole of our workforce, save the on-site leadership staff, receive 24 hours of training annually. We do not believe that 10 hours alone would be sufficient to help staff adequately meet the needs of youth.

**Response:** 7 AAC 57.350(f) is proposing to increase annual training relevant to child care and development from 20 to 24 hours each year. The training requirements may also be obtained by completing at least one semester hour of college credit. For a Home and Group Home there is no proposed requirement for an administrator to obtain three ECE credits annually.

Licensed providers can also apply for financial assistance for education and training opportunities through thread, Alaska's statewide Child Care Resources and Referral Network: Professional Development Reimbursement which provides a reimbursement of up to \$1,500 per person, per year for higher education, trainings, or conferences; Travel Reimbursement which provides a reimbursement of up to \$1,000, per person, per year; and "Pathways to Professionalism" which provides

up to \$425 for Child Development Associate (CDA) application fees and renewal fees.

## **7 AAC 57.500. Supervision of children.**

- 1. Comment/Question:** 7 AAC 57.500, we agree and need it written so everyone can understand it. We look forward to more information as it comes available.

**Response:** Thank you for your comment.

## **Comments for 7 AAC 57.505. Child-to-caregiver ratios.**

- 1. Comment/Question:** We understand in 7 AAC 57.505 and 57.510 that child-to-caregiver ratios and group sizes are not subject to changes, rather there is a proposed amendment for clarity around ratio requirements. We do ask that the following be taken into consideration for any future proposed changes to the child-to-caregiver and group size regulations:

Ratio requirements help ensure adequate supervision of youth in care. In addition to adequate supervision, individualized attention is critical to quality care of children. Additionally, research has shown that smaller groups of youth are associated with reduced risk of disease transmission, higher levels of safety, and more developmentally appropriate activities (Richard Fiene, 13 Indicators of Quality Child Care, Boulder, CO: University of Colorado, National Resource Center for Health and Safety in Child Care, 2002). Based on these factors and desired outcomes for youth in program, Camp Fire Alaska proposes a reduction to the State's child-to-caregiver ratios to align, at minimum, with the National Association for the Education of Young Children's (NAEYC) accreditation standards which provide the best learning experiences for young children and their educators by meeting national standards of quality. NAEYC-accredited programs must meet the following ratio and group size requirements (see chart printout).

Currently Camp Fire uses a 1:10 ratio with all school age youth, which does not even include the on-site leadership who we aim to keep 100% out of our ratio count. Under most circumstances, we find often that is more than is what is needed (with older youth in particular); however, when there is an elevated, challenging, disruptive, or dangerous youth

behavior, the lower ratio (coupled with an adult out of ratio when possible), both decrease any negative impacts the undesired behavior has on other youth and increases our staff's ability to provide an appropriate level of intervention support until the behavior is corrected. Moreover, having a decreased ratio that does not include the site administrator increases family engagement (as they are free of supervision responsibilities to meaningfully connect to them) as well as increases our continuous quality improvement (as they are free of supervision responsibilities to observe staff performance).

**Response:** Thank you for your comment. This will be taken into consideration to this and/or future proposed regulations changes.

## **7 AAC 57.550. Health.**

**1. Comment/Question:** 7 AAC 57.550, Health, is proposed to be amended to revise the proof of immunization requirements for a child care facility for clarity. Will this proposed language address meeting the needs of certain population such as the homeless and children in OCS? The Office of Epidemiology would like to see this addressed in regulation. For example, if a child that is homeless does not have access to immunizations, they would not have them as soon as required in current code. The family can provide information on actions taken to obtain a record of immunization or begin obtaining immunizations again. Evidence of immunizations provided in AK will be in VacTrAK and therefore accessible to public health clinics.

**Response:** Thank you for your comment or question. This will be taken into consideration to this and/or future proposed regulations changes.